

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Maggie Elizabeth Evans, Debtor

**Case No. 24-51069-KMS
CHAPTER 13**

RESPONSE

COMES NOW, Debtor, by and through counsel, and responds to Creditor, Cadence Bank f/k/a BancorpSouth Bank's (Movant) Motion for Relief from Automatic Stay and Co- Debtor Stay, Abandonment and Other Relief (dk # 33) as follows:

1. Debtor commenced this case on July 29, 2024 by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. Debtor has agreed to the Movant's terms, agreeing to include both the ongoing monthly mortgage payment and the mortgage arrearage in the Chapter 13 plan payments.

WHEREFORE, Debtor prays for an Order denying the Motion and for such additional or alternative relief as may be just and proper.

Respectfully submitted,

By: /s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MSBN 103469)
Attorney for Debtor

Of Counsel:

Thomas C. Rollins, Jr. (MSBN 103469)
Jennifer A Curry Calvillo (MSBN 104367)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
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601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Response was forwarded on July 8, 2025, to:

By USPS First Class Mail:

Cadence Bank
P.O. Box 789
Tupelo, MS 38802

By Electronic CM/ECF Notice:

David Rawlings

Charles Frank Fair Barbour, Attorney for Creditor

U.S. Trustee

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

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4 UNITED STATES BANKRUPTCY COURT
5 SOUTHERN DISTRICT OF MISSISSIPPI
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78 IN RE:
9 Maggie Elizabeth Evans
1011 CASE NO: 24-51069
12 **DECLARATION OF MAILING**
13 **CERTIFICATE OF SERVICE**
14 Chapter: 13
1516 On 7/8/2025, I did cause a copy of the following documents, described below,
1718 Response
1920 to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with
21 sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and
22 incorporated as if fully set forth herein.23 I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.
24 com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to
25 Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if
26 fully set forth herein.27 Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been
28 served electronically with the documents described herein per the ECF/PACER system.

29 DATED: 7/8/2025

30 /s/ Thomas C. Rollins, Jr.
31 Thomas C. Rollins, Jr.32 The Rollins Law Firm
33 702 West Pine St
34 Hattiesburg, MS 39401
35 601 500 5533
36 trollins@therollinsfirm.com
37

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4 **UNITED STATES BANKRUPTCY COURT**
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8 IN RE:
9 Maggie Elizabeth Evans
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11 CASE NO: 24-51069
12 **CERTIFICATE OF SERVICE**
13 **DECLARATION OF MAILING**
14 Chapter: 13
15

16 On 7/8/2025, a copy of the following documents, described below,
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18 Response
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20 were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient
21 postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth
22 herein.

23 The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above
24 referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of
25 Service and that it is true and correct to the best of my knowledge, information, and belief.

26 DATED: 7/8/2025
27

28
29 
30 _____
31 Miles Wood
32 BK Attorney Services, LLC
33 d/b/a certificateofservice.com, for
34 Thomas C. Rollins, Jr.
35 The Rollins Law Firm
36 702 West Pine St
37 Hattiesburg, MS 39401
38

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

FIRST CLASS

CADENCE BANK
P.O. BOX 789
TUPELO MS 38802